

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

2014 Quadrennial Regulatory Review – Review)	
of the Commission’s Broadcast Ownership Rules)	
and Other Rules Adopted Pursuant to Section)	MB Docket 14-50
202 of the Telecommunications Act of 1996)	
)	
2010 Quadrennial Regulatory Review – Review)	
of the Commission’s Broadcast Ownership Rules)	MB Docket 09-182
and Other Rules Adopted Pursuant to Section 202)	
of the Telecommunications Act of 1996)	
)	
Promoting Diversification of Ownership)	
In the Broadcasting Services)	MB Docket 07-294
)	
Rules and Policies Concerning)	
Attribution of Joint Sales Agreements)	
In Local Television Markets)	MB Docket 04-256
Multiple Ownership Rule)	

To: The Commission

MOTION FOR EXTENSION OF TIME

Prometheus Radio Project and Media Mobilizing Project (“Movants”) respectfully request a 30-day extension of time of the deadline to file oppositions and replies to the Petitions for Reconsideration filed in the above-captioned docket. Movants ask that oppositions be due on February 16, 2017, and replies be due February 24, 2017.

Movants recognize that the Commission does not ordinarily grant such extensions, but in this case there is good cause to depart from the general policy. Deadlines for filing oppositions and replies to reconsideration petitions are triggered by publication in the Federal Register and thus are not entirely within the control of the Commission. By virtue of the Commission’s timely - and appropriate - submission of the matter for publication, the deadline for filing was automatically established as falling on January 17, 2016 (for oppositions) and January 24, 2017 (for replies). It is unlikely that, if the Commission were itself setting the deadlines, it would have

chosen dates that overlap with the holiday season and the quadrennial Inauguration holiday period.

Meeting the current deadlines is complicated by the fact that time has already been lost because of the holiday period. However, this is not merely a matter of personal convenience; the present schedule has made it difficult for counsel to consult with clients and, therefore, interfere with the development of a complete record for the Commission to consider.

An additional special circumstance is that the deadlines come at a moment of transition for the Commission. As of this date, the Commission has been reduced to four members. Chairman Wheeler has announced that will step down as of January 20, 2017, and his successor will be named by a new President. Even if it were it ordinarily the case that the Commission and staff would begin to decide how to resolve the petition for reconsideration immediately after the filing of replies on January 24, the Commission and staff will be in a period of reorganization that will likely preclude decisionmaking on controversial matters for at least several weeks. Thus, a one month delay will not interfere with the administration of this proceeding.

With due respect for the Commission's disinclination to grant extensions, Movants note that the staff, faced by these circumstances that are unlikely to recur for many years, if at all, has recently granted similar extensions in two other proceedings. *See* DA16-1420 (December 20, 2016) (Docket 13-326) and DA 16-1409 (December 19, 2016) (Docket 16-41).

Wherefore, Movants ask that the Commission extend the filing deadlines for oppositions and replies in this proceeding to February 17, and February 24, 2017, respectively, and grant all such other relief as may be just and proper.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew Jay Schwartzman".

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